

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DEJA BARBOUR, SHINNEL GONZALES, and
RAKAYYAH MASSEY,

Plaintiffs,

-against-

THE CITY OF WHITE PLAINS, MARK
BURNETT, ANTHONY CARRA, KEVIN
CHRISTOPHER, ANTHONY FARRELLY,
JOHN HEFFNER, LAVALLE LARRIER,
GILBERT LOPEZ, ANTONIO NOLLETTI,
and JOHN and JANE DOES,

Defendants.
-----x

No. 06 CV.3014(KMK)

ECF CASE

**DEFENDANTS' INITIAL
DISCLOSURES PURSUANT
TO FED.R.CIV.P.26(a)(1)**

Pursuant to Rule 26 of the Federal Rules of Civil Procedure,
Defendants, THE CITY OF WHITE PLAINS, MARK BURNETT, ANTHONY CARRA, KEVIN
CHRISTOPHER, ANTHONY FARRELLY,
JOHN HEFFNER, LAVALLE LARRIER, GILBERT LOPEZ, ANTONIO NOLLETTI, by their
counsel, JOSEPH A. MARIA, P.C. hereby sets forth their Initial Disclosure as
follows:

A. The name and if known, the address and telephone number of
each individual likely to have discoverable information that the
disclaiming party may use to support its claims or defenses unless
solely for impeachment, identifying the subjects of the information:

1. The Parties to this Action.
2. Grace Jones.

3. Other witnesses may become necessary and identifiable as discovery continues, and Defendant reserves the right to supplement this list.

B. A copy of, or a description by category and location of, all documents, data, computations, and tangible things in the possession; custody, or control of the party and that the disclosing party may use to support its claim or defenses, unless solely for impeachment:

1. Defendants' police records.
2. Accusatory Instruments/Informations.

Defendant reserves the right to amend this list.

C. Computation of Damages.

Not Applicable.

D. Insurance Agreement.

1. Defendant is 100% self-insured.

Dated: White Plains, New York
May 19, 2008

Yours, etc.

JOSEPH A. MARIA, P.C.

By: _____

Frances Dapice Marinelli, Esq.

Attorneys for Defendants

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File #: 33-0725

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